

IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

QUINCY ROGERS.

**Plaintiff,**

**V.**

**ASHLAND INC.,**

**Defendant.**

**Case No. 08 C 1325**

**Judge Elaine E. Bucklo**

**Mag. Judge Cox**

## DEFENDANT'S RULE 26(a) INITIAL DISCLOSURES

Defendant Ashland Inc., by and through its counsel, makes the following initial disclosures pursuant to Rule 26(a) of the Federal Rules of Civil Procedure based upon information reasonably available to them at this time. Defendant reserves the right to make any additional disclosures as additional information becomes available. By making these disclosures, Defendant does not waive its right to object to the production of any document or tangible thing disclosed herein or to object to the testimony of any person identified on the basis of attorney-client privilege, the work product doctrine, relevancy, undue burden, or any other valid objection.

**A. Names of Individuals Likely to Have Discoverable Information**

The following individuals are likely to have discoverable information that Defendant may use to support its defenses:

Anthony Kuk Plant Manager Ashland Inc. 8500 Willow Springs Willow Springs, IL 60480 (708) 588-2900	Mr. Kuk should have knowledge of the claims in the complaint, the investigation relating to Plaintiff's termination, and the terms of Plaintiff's employment.
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Diego Rivera Assistant Plant Manager Ashland Inc. 8500 Willow Springs Willow Springs, IL 60480 (708) 588-2900	Mr. Rivera should have knowledge of the claims in the complaint, the investigation relating to Plaintiff's termination, and the terms of Plaintiff's employment.
Mike Nielubowski Union Steward Ashland Inc. 8500 Willow Springs Willow Springs, IL 60480 (708) 588-2900	Mr. Nielubowski should have knowledge of the terms of Plaintiff's employment and the circumstances surrounding his termination.
Pat Cassidy Regional Logistics Manager 8500 Willow Springs Willow Springs, IL 60480 (708) 588-2900	Mr. Cassidy should have knowledge of the claims in the complaint, the investigation relating to Plaintiff's termination, and the terms of Plaintiff's employment.
Caesar "Dan" Sosa Supervisor Ashland Inc. 8500 Willow Springs Willow Springs, IL 60480 (708) 588-2935	Mr. Sosa should have knowledge of the claims in the complaint, the investigation relating to Plaintiff's termination, and the terms of Plaintiff's employment.
Luis Rivera Material Handler Ashland Inc. 8500 Willow Springs Willow Springs, IL 60480 (708) 588-2900	Mr. Rivera should have knowledge of the events leading to Plaintiff's termination.
Erik Coates Former Material Handler 9546 S. Euclid Avenue Chicago, IL 60617	Mr. Coates should have knowledge of the events leading to Plaintiff's termination.

Plaintiff's counsel should contact Chuck Roesch or Kathleen Carnes to contact these individuals. Defendants reserve the right to supplement this response to the extent additional individuals are identified in the future as responsive to this disclosure.

**B. Documents Relevant to Disclosing Party's Claims or Defenses Pursuant to Federal Rule of Civil Procedure 26(a)(1)(B)**

At this time, Defendant has in its possession, custody or control the following classes of documents that it may use in defense of this matter:

- Internal investigation documents and correspondence relative to the chemical spill and Plaintiff's involvement in the spill.
- Plaintiff's employment file with Defendant Ashland Inc.
- The Collective Bargaining Agreement between Defendant and International Brotherhood of Teamsters, Local 781
- Documents regarding Plaintiff's discharge.
- Documents relative to the training Plaintiff received while employed as Ashland, Inc.

Defendant reserves the right to supplement this response to the extent documents are identified in the future which may be responsive to this disclosure.

**C. Computation of Any Category of Damages Claimed by the Disclosing Party**

This category is not applicable to Defendant at this time.

**D. Insurance Agreement**

A copy will be made available for inspection and copying at a mutually agreeable time and location.

Respectfully submitted,

ASHLAND INC.

By:       /s/ Victor J. Pioli      

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**CERTIFICATE OF SERVICE**

I hereby certify that on April 17, 2008, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following: Josh Friedman, 120 South State Street, Suite 200, Chicago, IL 60603, Attorney for Plaintiff.

/s/ Victor J. Pioli

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